

# Exhibit Q

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, )  
ET AL., )  
Plaintiffs, )  
)  
vs. ) Case No. 5:21-CV-844-XR  
)  
GREGORY W. ABBOTT, ET AL., )  
Defendants. )

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OCA-GREATER HOUSTON, ET AL., )  
Plaintiffs, )  
)  
vs. ) Case No. 1:21-CV-780-XR  
)  
JOHN SCOTT, ET AL., )  
Defendants. )

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HOUSTON AREA URBAN LEAGUE, ET )  
AL., )  
Plaintiffs, )  
)  
vs. ) Case No. 5:21-CV-848-XR  
)  
GREGORY WAYNE ABBOTT, ET AL., )  
Defendants. )

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LULAC TEXAS, ET AL., )  
Plaintiffs, )  
)  
vs. ) Case No. 1:21-CV-0786-XR  
)  
JOHN SCOTT, ET AL., )  
Defendants. )

Job No. 824263

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MI FAMILIA VOTA, ET AL.,                 )  
Plaintiffs,                                 )  
                                              )  
vs.                                          ) Case No. 5:21-CV-0920-XR  
                                              )  
GREG ABBOTT, ET AL.,                    )  
Defendants                                   )

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ORAL AND VIDEO-RECORDED DEPOSITION OF RAY SHACKELFORD,  
produced as a witness at the instance of the State of  
Texas Defendants and duly sworn, was taken in the  
above-styled and numbered cause on Friday, April 29, 2022,  
from 10:08 a.m. to 5:22 p.m., before JAMES M. PLAIR,  
Certified Shorthand Reporter in and for the State of  
Texas, reported by computerized stenotype machine at the  
offices of REED SMITH, L.L.P., 811 Main Street, Suite  
1700, Houston, Texas 77002-6110, pursuant to the Federal  
Rules of Civil Procedure and the provisions stated on the  
record or attached hereto.

1           A.    And so between myself, Mr. Robinson, uhm, our  
2   volunteers from, uh, the YPs and the Guild, we probably  
3   had about 20 to 30 people show up and we went with Common  
4   and knocked on doors.

5                   Uhm, and one of the stories or anecdotes I  
6   tell people that's still funny to me -- because, you know,  
7   we have been telling people to Get Out The Vote for weeks,  
8   months or what have you, and there was this one particular  
9   door over in the Cuney Homes, which is actually where  
10   George Floyd grew up, which is why we took him there,  
11   because of the significance of it, uhm.

12                   And I remember this one door we knocked on  
13   and the lady you can hear from the back yelling, like,  
14   "Don't open the" bleeping "door", uhm, and her brother  
15   opens the door and she's getting ready to come up there  
16   and let me have it and she sees Common and her whole  
17   demeanor changes; she starts smiling.

18                   And he is like, you know, "How are you  
19   doing?"   She is like, "I'm fine."   He's like, "Are you  
20   going to go vote?"   And she's like, "Ima go vote," and  
21   I'm, like, "We have been telling you how to go vote."

22                   But you know what?   I was, like, "Whatever  
23   gets you to the polls."   Uhm, if it a takes every now and  
24   then a celebrity or somebody to encourage people to get  
25   out to vote, uhm, and even that same day, there was

1 actually an elderly woman we came across that Mr. Robinson  
2 ended up taking to go help vote, uhm, and I bring that up  
3 because she was somebody who was visually impaired, uhm,  
4 and Mr. Robinson had to help her, like, literally tell  
5 her, like, "Okay. This is what this says. This is what  
6 this says," on her ballot, uhm, and so had it not been for  
7 Mr. Robinson being present and being able to assist her,  
8 which is something that now, potential -- not potentially,  
9 is harmed as a result of SB 1, uh, because now people have  
10 to actually sign some type of affidavit or something every  
11 time, uh, they decide to help someone when they are  
12 voting, uh, and we have already gotten feedback from the  
13 community that we swerve, you know, in the Cuney Homes and  
14 some of these other neighborhoods in the Third Ward,  
15 Sunnyside and Fifth Ward, that they are intimidated by  
16 things like this and so it makes they not want to, uhm,  
17 help people.

18 And so it's not only a burden on the people  
19 that want to provide assistance but it's a burden on the  
20 voters that need assistance, because now, they don't have  
21 access to as many people that otherwise would be willing  
22 to help them.

23 Uhm, but, yeah, I think -- And as we're  
24 talking, I'm starting to remember more things.

25 Q. Uh-hm.

1           A.     So that's -- that's helpful, but those are some  
2     other activities that we may not have discussed, uhm,  
3     earlier that would also fall under this same paragraph.

4           Q.     So you -- you told me that, uhm, you had heard  
5     from some folks in your community, uhm, that they  
6     didn't -- that they didn't feel comfortable signing the  
7     affidavit after voter assistance.

8                     Is that right?

9           A.     Uh, correct.

10          Q.     And so what -- What's their concern with that?

11          A.     Uh, well, if you're familiar with the history of  
12     the Black community and the Government, it's not  
13     necessarily the most trusting relationship in general,  
14     based on the fact that even now and even this last  
15     legislative session, there is still language from those  
16     times when we were not even allowed to purchase homes in  
17     certain areas in Houston, uhm, and that was actually  
18     implemented by our Government here, in -- in the -- in  
19     this country and in the state of Texas.

20                     And so when you think about that historical  
21     relationship and the harm that has been placed on the  
22     community by the Government, they are not necessarily  
23     running to go sign an affidavit just because they want to  
24     help somebody to go vote.

25          Q.     And so what did they tell you?

1 So that is -- It makes people nervous,  
2 because it's, like, "Maybe if I say something that I  
3 shouldn't have said, and now, all of a sudden, I am being  
4 charged with a crime"; whereas, before, that was not  
5 something they were faced with.

6 And even when you look at some of the reach  
7 of the poll watchers now, uhm, it's something that you can  
8 be, again, charged with a crime, uh, for not cooperating  
9 with partisan poll watchers specifically.

10 And so there is a great deal of anxiety  
11 when it comes to that. Uhm, it causes a burden from a  
12 mental health perspective and, ultimately, when it turns  
13 away people that potentially would volunteer with an  
14 organization like HAUL that is very limited when you are  
15 talking about staff and we depend on volunteers, and so  
16 now things are putting this place -- being put in place  
17 that turns our volunteers away and members of the  
18 community away, it means we now have to hire more people  
19 to perform these types of actions which we do not have,  
20 you know, sums of money just to fund -- fund all of these  
21 activities.

22 Q. HAUL is not challenging the poll watcher  
23 provisions of SB 1.

24 Is it?

25 A. It's not -- Well, let me say this: I don't know